IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re:	Chapter 11
GULF COAST HEALTH CARE, LLC, et al.,) Case No. 21-11336 (KBO)
Debtors.) Jointly Administered
)))
BELFOR USA GROUP, INC.,	
Plaintiff,))
V.) Adversary No. 22-50355 (KBO)
GULF COAST HEALTH CARE, LLC, NF GLEN COVE, LLC d/b/a GLENCOVE HEALTH AND REHABILITATION CENTER,)))
Defendants.))

CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION REGARDING SCHEDULING IN CONNECTION WITH ADVERSARY PROCEEDING

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the "**Debtors**"), hereby certifies as follows:

- 1. Belfor USA Group, Inc. (the "Plaintiff") and the Debtors (collectively with the Plaintiff, the "Parties" and each a "Party") have agreed to the scheduling of certain deadlines with respect to the above-captioned adversary proceeding (the "Adversary Proceeding").
- 2. The Parties have memorialized their agreement in the *Stipulation Regarding*Scheduling in Connection with Adversary Proceeding (the "Stipulation"). A proposed form of

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Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation (as defined herein).

order approving the Stipulation is attached hereto as **Exhibit A** (the "**Proposed Order**"). The Stipulation is attached as Exhibit 1 to the Proposed Order.

3. Counsel to each of the Parties has signed the Stipulation and has agreed that it may be submitted under certification of counsel for approval by the Court.

Accordingly, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as **Exhibit A** at the convenience of the Court.

Dated: Wilmington, Delaware

July 13, 2022

MCDERMOTT WILL & EMERY LLP

/s/ David R. Hurst

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